

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

LAURA PATRICK,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil Action No. 04-CV-10427 RGS
	)	
JANSSON CORPORATION,	)	
	)	
Defendant.	)	

**AFFIDAVIT OF JOEL RUDY**

Joel Rudy hereby deposes and states as follows:

1. I am the President of Jansson Corporation ("Jansson"). In 2001, I was the Director of Jansson.
2. Since 1998 (when Taylor Corporation purchased Jansson), five Jansson employees have transferred from full-time, salaried employment to part-time, hourly employment, or vice-versa.
3. In each case, and regardless of the reason for the transfer, Jansson has adjusted the salary or wage of the individual up or down, according to the direction of change.
4. The hourly wages of individuals who moved from salaried to hourly employment were decreased across the board to reflect the decreased responsibilities, as well as the decreased hours of these non-salaried employees.
5. The wage of salaried employees assumes that the employees work 4-7 hours of overtime each week.

6. Attached here to as Exhibit A is a true and correct copy of the transcript of the deposition of Laura Patrick and selected exhibits thereto.

Signed under the penalties of perjury this 31<sup>st</sup> day of January 2005.

/s/ Joel Rudy

Joel Rudy